

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KPM ANALYTICS NORTH AMERICA
CORPORATION,

Plaintiff.

V.

BLUE SUN SCIENTIFIC, LLC, THE
INNOVATIVE TECHNOLOGIES GROUP &
CO., LTD., ARNOLD EILERT, MICHELLE
GAJEWSKI, ROBERT GAJEWSKI,
RACHAEL GLENISTER, GREGORY
ISRAELSON, IRVIN LUCAS, AND PHILIP
OSSOWSKI,

Defendants.

Civil Action No. 21-cv-10572-MRG

**KPM ANALYTICS NORTH AMERICA CORPORATION'S
MOTION FOR A PERMANENT INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65 and the Jury's Verdict (ECF No. 230), Plaintiff KPM Analytics North America Corporation ("KPM") respectfully requests that the Court issue a permanent injunction against all defendants consistent with the Proposed Order filed herewith. In support of the relief sought, KPM also files herewith its Memorandum in Support of KPM's Motion for a Permanent Injunction. KPM requests oral argument on its Motion for a Permanent Injunction.

WHEREFORE, KPM respectfully requests that the Court enter a permanent injunction against all defendants.

Date: June 21, 2023

Respectfully submitted,

**KPM ANALYTICS NORTH AMERICA
CORPORATION**

By its attorneys,

/s/ John T. Gutkoski

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Local Rule 7.1 Certification

The undersigned counsel met and conferred with opposing counsel concerning the relief sought in this Motion via email on June 21, 2023.

/s/ John T. Gutkoski

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of June 2023, a true and exact copy of the foregoing was served on all counsel of record through the Court's ECF system.

/s/ John T. Gutkoski